

1 COOLEY LLP  
2 BOBBY GHAJAR (198719)  
(bghajar@cooley.com)  
3 COLETTE GHAZARIAN (322235)  
(cghazarian@cooley.com)  
4 1333 2nd Street, Suite 400  
Santa Monica, California 90401  
Telephone: (310) 883-6400  
5 MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
6 KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
7 JUDD LAUTER (290945)  
(jlauter@cooley.com)  
8 ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
9 3175 Hanover Street  
Palo Alto, CA 94304-1130  
Telephone: (650) 843-5000  
10  
11 CLEARY GOTTLIEB STEEN & HAMILTON LLP  
12 ANGELA L. DUNNING (212047)  
(adunning@cgsh.com)  
13 1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304  
14 Telephone: (650) 815-4131

15 *Counsel for Defendant Meta Platforms, Inc.*

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,  
Individual and Representative Plaintiffs,  
v.  
META PLATFORMS, INC., a Delaware  
corporation;  
Defendant.

Case No. 3:23-cv-03417-VC  
**STIPULATION AND [PROPOSED] ORDER RE  
SCHEDULE**

1 Pursuant to the Court's order dated October 4, 2024 (ECF No. 211) and Civ. L.R. 7-12,  
 2 Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew  
 3 Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman,  
 4 Matthew Klam, Junot Díaz and Lysa Terkeurst ("Plaintiffs"); and Defendant Meta Platforms, Inc.  
 5 ("Defendant," together with Plaintiffs, "Parties") by and through their respective counsel stipulate  
 6 to the following:

7 WHEREAS, on October 4, 2024, the Court set a new fact discovery deadline of December  
 8 13, 2024, and a hearing on dispositive motions with respect to the named Plaintiffs' claims for May  
 9 1, 2025;

10 WHEREAS, the Court ordered the Parties to meet and confer and file a stipulation as to  
 11 surrounding dates;

12 WHEREAS the Parties met and conferred and agreed upon the following deadlines;

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through  
 14 Plaintiffs and Defendant, as represented by their undersigned counsel, the following schedule is  
 15 hereby agreed to and proposed to the Court:

Case Event	Date
Meet and Confer re: Existing Written Discovery	October 16, 2024
Serve Additional Written Discovery Requests	October 18, 2024
Exchange Supplemental Initial Disclosures	October 21, 2024
Letter Briefs re: Existing Written Discovery	October 23, 2024
Close of Fact Discovery	December 13, 2024 (Set by the Court)
Opening Expert Reports Due	January 10, 2025
Rebuttal Expert Reports Due	February 3, 2025

1	Close of Expert Discovery	February 26, 2025
2	Opening Summary Judgment and <i>Daubert</i> Briefs Due	March 7, 2025
3	Oppositions to Summary Judgment and <i>Daubert</i> Briefs Due	April 3, 2025
4	Replies in Support of Summary Judgment and <i>Daubert</i> Briefs Due	April 17, 2025
5	Hearing on Summary Judgment Motions	May 1, 2025 (Set by the Court)

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Dated: October 11, 2024  
2

3 By: /s/ Kathleen R. Hartnett

4 Bobby A. Ghajar  
5 Colette Ani Ghazarian  
6 **COOLEY LLP**  
7 1333 2nd Street, Suite 400  
8 Santa Monica, CA 90401  
9 Telephone: (310) 883-6400  
10 Facsimile: (310) 883-6500  
11 Email: bghajar@cooley.com  
12 cghazarian@cooley.com

13 Mark R. Weinstein  
14 Elizabeth Lee Stameshkin  
15 **COOLEY LLP**  
16 3175 Hanover Street  
17 Palo Alto, CA 94304  
18 Telephone: 650-843-5000  
19 Facsimile: 650-849-7400  
20 Email: mweinstein@cooley.com  
Email: lstameshkin@cooley.com

21 Kathleen R. Hartnett  
22 Judd D. Lauter  
23 **COOLEY LLP**  
24 3 Embarcadero Center, 20th Floor  
25 San Francisco, CA 94111-4004  
26 Telephone: (415) 693-2071  
27 Facsimile: (415) 693-2222  
28 Email: khartnett@cooley.com

29 Angela Dunning  
30 **CLEARY GOTTLIEB STEEN &**  
31 **HAMILTON LLP**  
32 1841 Page Mill Road, Suite 250  
33 Palo Alto, CA 94304-1248  
34 Telephone: (650) 815-4131  
35 Email: adunning@cgsh.com

36 *Attorneys for Defendant*

37 *META PLATFORMS, INC.*

38 Respectfully Submitted,

39 By: /s/ David Boies

40 David Boies (pro hac vice)  
41 David L. Simons (pro hac vice)  
42 **BOIES SCHILLER FLEXNER LLP**  
43 55 Hudson Yards, 20th Floor  
44 New York, NY 10001  
45 (914) 749-8200  
46 dboies@bsflp.com  
47 dsimons@bsflp.com

48 Maxwell V. Pritt (SBN 253155)  
49 Joshua I. Schiller (SBN 330653)  
50 Joshua M. Stein (SBN 298856)  
51 44 Montgomery Street, 41st Floor  
52 San Francisco, CA 94104  
53 (415) 293-6800  
54 mpritt@bsflp.com  
55 jischiller@bsflp.com  
56 jstein@bsflp.com

57 Jesse Panuccio (pro hac vice)  
58 1401 New York Ave, NW  
59 Washington, DC 20005  
60 (202) 237-2727  
61 jpanuccio@bsflp.com

62 Joseph R. Saveri (State Bar No. 130064)  
63 Cadio Zirpoli (State Bar No. 179108)  
64 Christopher K.L. Young (State Bar No. 318371)  
65 Holden Benon (State Bar No. 325847)  
66 Aaron Cera (State Bar No. 351163)  
67 **JOSEPH SAVERI LAW FIRM, LLP**  
68 601 California Street, Suite 1505  
69 San Francisco, California 94108  
70 Telephone: (415) 500-6800  
71 Facsimile: (415) 395-9940  
72 Email: jsaveri@saverilawfirm.com  
73 czirpoli@saverilawfirm.com  
74 cyoung@saverilawfirm.com  
75 hbenon@saverilawfirm.com  
76 acera@saverilawfirm.com

77 Amy Keller (pro hac vice)  
78 James A. Ulwick (pro hac vice)

1 Nada Djordjevic (*pro hac vice*)  
2 **DiCELLO LEVITT LLP**  
3 10 North Dearborn St., Sixth Floor  
4 Chicago, Illinois 60602  
5 Telephone: (312) 214-7900  
akeller@dicellosevitt.com  
julwick@dicellosevitt.com  
ndjordjevic@dicellosevitt.com

6 David A. Straite (*pro hac vice*)  
7 **DiCELLO LEVITT LLP**  
8 485 Lexington Ave., Suite 1000  
9 New York, NY 10017  
Telephone: (646) 933-1000  
dstraite@dicellosevitt.com

10 Matthew Butterick (State Bar No. 250953)  
11 1920 Hillhurst Avenue, 406  
12 Los Angeles, CA 90027  
13 Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

14 Bryan L. Clobes (*pro hac vice*)  
15 Alexander J. Sweatman (*pro hac vice anticipated*)  
16 **CAFFERTY CLOBES MERIWETHER**  
17 & SPRENGEL LLP  
18 135 South LaSalle Street, Suite 3210  
19 Chicago, IL 60603  
Telephone: (215) 864-2800  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

21 Daniel Jerome Muller  
22 **VENTURA HERSEY & MULLER, LLP**  
23 1506 Hamilton Avenue  
24 San Jose, CA 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: dmuller@venturahersey.com  
25 *Counsel for Individual and Representative*  
26 *Plaintiffs and the Proposed Class*

## **PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**

DATED: \_\_\_\_\_

**HON. VINCE CHHABRIA**  
United States District Judge

## **ECF ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the filing of this document.

/s/      Kathleen R. Hartnett